

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

STACY ARNOLD,)	
)	
Plaintiff,)	
)	Case No. 19-CV-06137-BP
v.)	
)	
CITY OF ST. JOSEPH, ET AL.,)	
)	
Defendants.)	

**DEFENDANTS ST. JOSEPH PUBLIC LIBRARY, CITY OF ST. JOSEPH AND
REBECCA HAILEY’S UNOPPOSED JOINT MOTION FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF’S MOTION FOR PROTECTIVE ORDER**

COME NOW Defendants St. Joseph Public Library, City of St. Joseph and Rebecca Hailey (“Defendants”) by and through their attorneys of record and move this Court for an extension of time to respond to Plaintiff’s Motion for Protective Order and Suggestions in Support (ECF No. 69). Defendants state the following in support of this Motion:

1. Plaintiff filed her Motion for Protective Order and Suggestions in Support (ECF No. 69) on July 16, 2020.
2. Defendants’ response is due July 30, 2020. Therefore this motion is timely.
3. Defendants’ counsel have been working on their response to Plaintiff’s Motion but have been unable to complete them due to the press of other matters to include summary judgment briefing in separation actions. Accordingly, Defendants request a seven (7) day extension through and up to August 6, 2020, to file their responses.
4. Defendants are constrained to make this request out of necessity and not for the purpose of causing any unnecessary delay.
5. Defendants have sought no prior extensions to this deadline.

6. The proposed extension of this deadline will not create any delays in this matter.

7. Defendants' counsel has contacted Plaintiff regarding the requested extension of time and Plaintiff has no objection to the requested extension.

WHEREFORE, Defendants St. Joseph Public Library, City of St. Joseph and Rebecca Hailey request that this Court grant them an additional seven (7) business days up to and including August 6, 2020 within which to file their responses to Plaintiff's Motion for Protective Order and Suggestions in Support (ECF No. 69).

Respectfully submitted,

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Attorneys for Defendants City of St. Joseph and
Rebecca Hailey

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of July, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to the following:

Stacy Arnold
500 Westover Drive #11589
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Plaintiff, *pro se*

/s/ Gregory P. Goheen_____